

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**FEE APPLICATION COVER SHEET FOR THE PERIOD**  
**MARCH 1, 2024 THROUGH MARCH 31, 2024**

Debtor: LTL Management LLC Applicant: Brown Rudnick LLP  
Case No.: 23-12585 (MBK) Client: Official Comm of Talc Claimants  
Chapter: 11 Case Filed: April 4, 2023

**SECTION 1**  
**FEE SUMMARY**

☒ Post-Dismissal Monthly Fee Statement No. 4 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from March 1, 2024 through March 31, 2024  
(the "Fourth Post-Dismissal Statement")

Total Fees: \$106,195.00<sup>1</sup>  
Total Disbursements: \$634.41  
Minus 20% holdback of Fees (\$21,239.00): \$84,956.00  
**Total Amount Sought To Be Paid at this Time: \$85,590.41**

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
David J. Molton	Partner 1983	1.1	\$2,250	\$2,475.00
Jeffrey L. Jonas	Partner 1988	1.1	\$2,250	\$2,475.00
Michael S. Winograd	Partner 2001	49.3	\$1,800	\$88,740.00
Susan Sieger-Grimm	Counsel 1994	8.1	\$1,200	\$9,720.00
Michael W. Reining	Associate 2015	1.6	\$975	\$1,560.00
Alexander F. Kasnetz	Associate 2018	.5	\$975	\$475.00
Harriet E. Cohen	Paralegal	1.5	\$500	\$750.00
<b>TOTALS</b>		<b>63.2</b>		<b>\$106,195.00</b>

<sup>1</sup> Brown Rudnick excluded fees in the amount of \$2,122.50 in respect of transient timekeepers and other voluntary reductions.

Fee Totals:	<u>\$106,195.00</u>
Disbursements Totals:	<u>\$634.41</u>
Total Fee Application	<u>\$106,829.41</u>

**SECTION II  
SUMMARY OF SERVICES**

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEE</b>
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.	0.0	\$0.00
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) <b>Case Administration</b> Coordination and compliance activities, including review of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.0	\$0.00
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	1.5	\$750.00
i) <b>Fee/Employment Objections</b> Review of an objections to the employment and fee applications of others.	0.0	\$0.00
j) <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) <b>Litigation</b> General litigation and other contested matters.	48.0	\$86,407.50
l) <b>Meetings of Creditors</b> Preparing for and attending the conference of creditors, the 341 meeting and creditors' committee meetings.	13.7	\$19,037.50
m) <b>Plan and Disclosure Statement</b> Formulation, analysis, presentation, and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0.0	\$0.00

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEE</b>
n) <b>Relief from Stay Proceedings / Injunction Litigation in Adversary Proceeding</b> Matters relating to termination or continuation of automatic stay under sections 362 and 105; matters relating to preliminary injunction and related appeals.	0.0	\$0.00
o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) <b>Valuation</b> Appraise or review appraisals of assets.	0.0	\$0.00
w) <b>Travel Time (billed @ 50%)</b>	0.0	\$0.00
x) <b>Committee Governance Matters</b> Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters.	0.0	\$0.00
y) <b>Investigation and Due Diligence</b> Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) <b>Hearings</b> Preparation for and attendance at hearings.	0.0	\$0.00
aa) <b>Mediation</b> Preparation for and attendance at mediation.	0.0	\$0.00
bb) <b>Dismissal / Trustee / Examiner Matters</b> Issues relating to motions to dismiss, motions to appoint an examiner or trustee, and related appeals as applicable.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
cc) <b>Meetings of Co-Counsel</b> Preparing for and attendance at meetings of co-counsel and other TCC professionals to develop case strategy, coordinate actions items and prepare in advance of full committee meetings.	0.0	\$0.00
<b>SERVICE TOTALS:</b>	<b>63.2</b>	<b>\$106,195.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing Fees</b> Payable to Clerk of Court.	\$307.00
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$0.00
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	\$0.00
d) <b>Fax</b> Include per page fee charged.	\$0.00
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges.	\$0.00
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	\$0.00
g) <b>Outside Reproduction Services</b> Including scanning services.	\$0.00
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) <b>Court Reporting</b> Deposition Services / Transcripts	\$0.00
j) <b>Travel</b> Mileage, tolls, airfare, parking.	\$0.00
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	\$0.00
l) <b>Postage</b>	\$0.00
m) <b>Other (specify) Meals</b> Meals.	\$0.00
p) <b>Other (specify)</b> Expert Fees.	\$0.00
q) <b>Other (specify)</b> eDiscovery Hosting.	\$327.41
<b>DISBURSEMENTS TOTAL:</b>	<b>\$634.41</b>

I certify under penalty of perjury that the above is true.

Dated: April 9, 2024

/s/ Gerard T. Cicero  
Gerard T. Cicero

BROWN RUDNICK LLP (“Brown Rudnick”) submits this Fourth Post-Dismissal Monthly Fee Statement of Brown Rudnick LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel for The Official Committee of Talc Claimants for the Period from March 1, 2024 through March 31, 2024 (“Fourth Post-Dismissal Monthly Fee Statement”), pursuant to the Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on May 22, 2023 [Docket No. 562] (the “Interim Compensation Order”).

WHEREFORE, Brown Rudnick respectfully requests payment of fees for the Fourth Post-Dismissal Monthly Fee Statement in the sum of \$84,956.00, together with expenses of \$634.41, for a total requested payment of \$85,590.41, in accordance with the terms of the Interim Compensation Order.

Dated: April 9, 2024

**BROWN RUDNICK LLP**  
*Co-Counsel to the Official Committee  
of Talc Claimants*

By: /s/ Gerard T. Cicero  
GERARD T. CICERO